

THE LAW OFFICE OF GARY KAUFMAN, PLLC

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January 14, 2021

Via ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 1/14/2021

The defendant is ordered to surrender at his designated facility
before 2 p.m. on April 1, 2021.

Re: *United States v. Ziskind, et al.*
18-cr-375-VSB

Dear Honorable Judge Broderick,

I am writing to request an extension of the date of Mr. Ziskind's surrender, which is currently scheduled for January 28, 2021, until April 1, 2021, on consent of the government, in light of the ongoing COVID-19 public health emergency and the anticipated cancer treatment of Mr. Ziskind's wife. This is Mr. Ziskind's first request for such an extension.

As the Court is aware, Mr. Ziskind's wife, Ilona Shustef, has cancer. Although, not scheduled yet, it is anticipated that Ms. Shustef will undergo one more round of radiation and chemotherapy to begin in February or March. Mr. Ziskind, would like to be present with his wife as she undergoes these procedures, and hopes to care for her until she is able to receive the COVID-19 vaccine as an immunocompromised person.

I am therefore requesting an extension of Mr. Ziskind's surrender until April 1, 2021 to allow Mr. Ziskind to care for his wife during the next few months, until the time that she has completed the upcoming round of radiation and chemotherapy and is able to receive the COVID-19 vaccination.

Thank you for your attention to this matter.

Sincerely,

/s/

GARY M. KAUFMAN, ESQ.
Attorney for Vladimir Ziskind

cc: AUSA Robert Boone
AUSA Andrew Thomas